

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

LOUIS DARRELL HARPER, SR. AND
BETTY DENISE HARPER

19-03880 – JAW

**TRUSTEE'S MOTION AND NOTICE FOR DETERMINATION OF
FINAL CURE AND PAYMENT OF ALL POST-PETITION PAYMENTS**

COMES NOW Trustee, Harold J. Barkley, Jr., and files this his Motion and Notice for Determination of Final Cure and Payment of All Post-Petition Payments. The Trustee moves the Court, pursuant to Sections 1322, 1327 and 1328 of the Bankruptcy Code, and Bankruptcy Rule 3002.1(h), for the entry of an order in this case to declare the mortgage loan currently held or serviced by U.S. Bank Trust National Association is current, and all defaults have been cured by the completion of Debtors' Chapter 13 Plan.

1. That, on April 1, 2025, the Trustee's Office filed the Trustee's Notice of Final Cure Payment (Docket Number 73). That, said document indicated that the amount established on the creditor's allowed proof of claim as arrears, has been paid in full.

2. Further, the Trustee's Notice of Final Cure Payment indicated that the regular on-going mortgage payments were to be deemed current through February 2025.

3. That, the Debtors shall be responsible for post-petition payments beginning March 1, 2025, in the amount of \$1,615.74.

4. That, the Notice of Final Cure Payment informed U.S. Bank Trust National Association of its obligation to respond and to file a statement indicating whether it agrees that the Debtors have paid in full the amount required to cure the arrears on said claim and that the Debtor is current on the on-going regular monthly mortgage payments.

5. That, U.S. Bank Trust National Association fled a response to the Notice of Final Cure Payment.

6. **YOU ARE FURTHER NOTIFIED** that all Objections must be made within twenty-one (21) days of the date of this Motion; same to be made in writing to the Clerk of this Court. Attorneys and Registered Users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at U. S. Bankruptcy Court, U. S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, with a copy mailed to the Trustee at the address below.

7. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Motion be received and filed and upon a hearing hereon this Honorable Court will enter its Order declaring that defaults due U.S. Bank Trust National Association the Debtors have been cured and that post-petition indebtedness is current through March 2025, and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: April 15, 2025

Respectfully submitted,

/s/ Harold J. Barkley, Jr.

HAROLD J. BARKLEY, JR. – MSB #2008

CHAPTER 13 TRUSTEE

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CERTIFICATE

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U S Trustee
ustpreion05.ja.ecf@usdoj.gov

Hon. Thomas C. Rollins, Jr.
trollins@therollinsfirm.com

Louis Darrell Harper, Sr.
Betty Denise Harper
112 Northgate Drive
Canton, MS 39406

CREDITOR PAYMENT AND NOTICE ADDRESS:

U.S. Bank Trust National Association
Selence Finance LP
Attn: Bankruptcy Dept.
3501 Olympus Blvd. Suite 500
Dallas, TX 75019

Dated: April 15, 2025

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.